

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF PENNSYLVANIA

In re:	Chapter 11
APPALACHIAN LIGHTING SYSTEMS, INC.,	Case No. 17-24454-GLT
Debtor.	Related to Document No. 301, 323
APPALACHIAN LIGHTING SYSTEMS, INC.,	<b>Hearing Date:</b>
Movant.	<b>October 24, 2019 at 1:30 p.m.</b>
vs.	<b>Response Deadline:</b>
THOMAS E. REILLY, P.C.,	<b>October 17, 2019</b>
Respondent.	

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**STIPULATED AGREED ORDER RESOLVING CAUTIONARY OBJECTION**

AND NOW, this \_\_\_\_ day of \_\_\_\_\_, 2019, upon consideration of the parties' stipulation set forth herein to resolve the *Cautionary Objection to Confirmation of Debtor's First Amended Chapter 11 Plan of Reorganization Dated September 5, 2019* filed by Thomas E. Reilly, Esq. and Thomas E. Reilly, P.C. [Docket No. 323] (the "Cautionary Objection"), upon the agreement of the parties below, and for good cause, it is hereby ORDERED, ADJUDGED and DECREED as follows:

1. Thomas E. Reilly, Esq. and Thomas E. Reilly, P.C. (collectively, "Reilly"), shall apply the \$1,000.00 retainer from James Wassel, the founder and president of Debtor, and his wife Gail Wassel (together, the "Wassels"), presently held by Reilly.
2. Reilly hereby withdraws the Cautionary Objection to the confirmation of "Debtor's First Amended Chapter 11 Plan of Reorganization Dated September 5, 2019" [Docket No. 301] (the "Plan") and supports confirmation of the Plan.

3. Debtor shall include in the Plan Confirmation Order notice of the withdrawal of the Objection and the following provision:

After payment of all Plan obligations due to creditors under the Plan from the IP Monetization (as defined in the Plan), Debtor shall direct \$29,000.00 from the IP Monetization to be paid to Thomas E. Reilly, P.C., at 1468 Laurel Drive, Sewickley, PA 15143, if, as, when and to the extent such funds become available from the IP Monetization.

4. Reilly hereby releases the Wassels and the Debtor, and the Wassels hereby release Reilly, from any and all claims related to the Claim, except for the obligations under this Stipulated Agreed Order.

**IT IS SO STIPULATED:**

/s/ Daniel A. DeMarco  
Daniel A. DeMarco (Ohio Bar No. 0038920)  
Admitted Pro Hac Vice  
Christopher B. Wick (Ohio Bar No. 0073126)  
Admitted Pro Hac Vice  
HAHN LOESER & PARKS LLP  
200 Public Square, Suite 2800  
Cleveland, Ohio 44114  
Telephone: (216) 621-0150  
Facsimile: (216) 241-2824  
E-Mail : dademarco@hahnlaw.com  
cwick@hahnlaw.com

and  
Kirk B. Burkley (PA ID No. 89511)  
707 Grant Street, Suite 2200 Gulf Tower  
Pittsburgh, PA 15219-1900  
Telephone: (412) 456-8108  
Facsimile: (412) 456-8135  
Email: kburkley@bernsteinlaw.com

*Co-counsel for Debtor*

/s/ Thomas E. Reilly  
Thomas E. Reilly, Esq. (PA ID No. 25832)  
Thomas E. Reilly, P.C.  
1468 Laurel Drive  
Sewickley, PA 15143  
Telephone: (724) 933-3500  
Email: [tereilly@tomreillylaw.com](mailto:tereilly@tomreillylaw.com)

/s/ James Wassel (see attached signature page)  
James Wassel

/s/ Gail Wassel (see attached signature page)  
Gail Wassel

The undersigned consent to the entry of the  
*Stipulated Agreed Order Resolving Cautionary  
Objection* attached as Exhibit A:

ALSI Investors, LLC



By: /s/ Kevin Jones (see attached signature page)  
Kevin Jones, Co-Manager

By: /s/ Richard Patton (see attached signature page)  
Richard Patton, Co-Manager

IT IS SO ORDERED, this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

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UNITED STATES BANKRUPTCY JUDGE

  
James Wassel  
  
Gail Wassel

The undersigned consent to the entry of the  
*Stipulated Agreed Order Resolving Cautionary  
Objection* attached as Exhibit A:

ALSI Investors, LLC

By:  
Kevin Jones, Co-Manager

By:  
Richard Patton, Co-Manager

IT IS SO ORDERED, this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

\_\_\_\_\_  
UNITED STATES BANKRUPTCY JUDGE

\_\_\_\_\_  
James Wassel

\_\_\_\_\_  
Gail Wassel

The undersigned consent to the entry of the  
*Stipulated Agreed Order Resolving Cautionary  
Objection* attached as Exhibit A:

ALSI Investors, LLC

By: Ken H Jones  
Kevin Jones, Co-Manager

By: \_\_\_\_\_  
Richard Patton, Co-Manager

IT IS SO ORDERED, this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

\_\_\_\_\_  
UNITED STATES BANKRUPTCY JUDGE

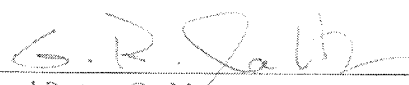
\_\_\_\_\_  
James Wassel

\_\_\_\_\_  
Gail Wassel

The undersigned consent to the entry of the  
*Stipulated Agreed Order Resolving Cautionary  
Objection* attached as Exhibit A:

ALSI Investors, LLC

*Bv:* \_\_\_\_\_  
Kevin Jones, Co-Manager

*Bv:*  \_\_\_\_\_  
Richard Patton, Co-Manager

IT IS SO ORDERED, this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

\_\_\_\_\_  
UNITED STATES BANKRUPTCY JUDGE